

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

**LEWIS MECHANICAL SALES, INC.,
Plaintiff,**

vs.

**DAVID GIRARD, Individually, and
UNION STANDARD INSURANCE
GROUP,
Defendants.**

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**C.A. NO. 2:17-cv-00156
JURY REQUESTED**

AFFIDAVIT OF JOHN SWALLOW

STATE OF TEXAS

§
§
§

COUNTY OF NUECES

BEFORE ME, the undersigned authority, personally appeared John Swallow, who, being by me duly sworn, deposed as follows:

1. “My name is John Swallow. I am of sound mind and one of the counsel of record for Plaintiff, Lewis Mechanical Sales, Inc., and am authorized to make this Affidavit.

2. Attached hereto as Exhibit “A-1” are screenshots and other documents obtained from the Union Standard Insurance Group website evidencing the home office address, Union Standard Insurance Groups President’s office location, senior management, and mailing address for Union Standard Insurance Group in Irving, Texas.

3. Additionally, attached hereto as Exhibit “A-2” are screenshots from www.linkedin.com evidencing the Senior Management of Union Standard Insurance Group and their primary place of business, all being in the Dallas/Fort Worth and Irving, Texas, areas.

4. These attachments are true and correct copies of the originals obtained from Union Standard Insurance Group’s website.



Further, affiant sayeth naught.”

SIGNED the 12th day of May, 2017.



JOHN SWALLOW

SUBSCRIBED AND SWORN TO BEFORE ME by the said JOHN SWALLOW on this
the 12th day of May, 2017, to certify which witness my hand and official seal.



Notary Public, State of Texas





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Union Standard Home Office

222 Las Colinas Blvd. W, Suite 1300
Irving, Texas 75039-5433

Mailing Address

P.O. Box 152180
Irving, Texas 75015
Phone: 972-719-2400
Toll Free: 800-444-0049
FAX: 972-719-2401

Billing Questions

Please call or email us at: usigdbsupport@usic.com.

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Please call or email us at: employment@usic.com.

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Please call or email us at: usqlosscontrol@usic.com.

Loss Run Requests

Please call or email us at: usigunderwriting@usic.com.

Premium Audit Questions

Please call or email us at: usigpremiumaudit@usic.com.

Marketing and Agency Licensing Requests

Please call or email us at: marketing@usic.com.





Insurance – Domestic

Union Standard is a regional property and casualty insurance provider offering insurance programs to small and mid-sized businesses across the central southern states.

The Union Standard Insurance Group Difference

In business since 1975, Union Standard Insurance Group offers preferred commercial property and casualty insurance solutions through independent insurance agents located throughout Arizona, Arkansas, New Mexico, Oklahoma and Texas.

We maintain a strong, local presence in each of our markets, keeping underwriting and marketing close to the customer. Our offices are staffed with professionals who understand each of their geographical areas and meet their customers' needs with exceptional underwriting discipline and superior insurance protection.

Our long-term strategy is built around relationships and service. At every level of the company, we respond promptly and fairly with quality client care. Our staff of highly qualified professionals works as a team to provide claims, loss control, audit, underwriting and policy services, offering the expertise and responsiveness that has helped us consistently outperform competitors for more than a decade.

"It's not just what we do, but how we do it" is the work ethic we take to heart. With dedicated employees and services our clients can rely on, we continue to distinguish ourselves from other companies. From small details to larger matters, we do things right the first time, ensuring our clients are taken care of and helping us live up to our core value that "Everything Counts, Everyone Matters®."

KEITH MITCHELL President

222 Las Colinas Boulevard W
Suite 1300
Irving, TX 75039
Tel: (972) 719-2400

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Insurance Companies

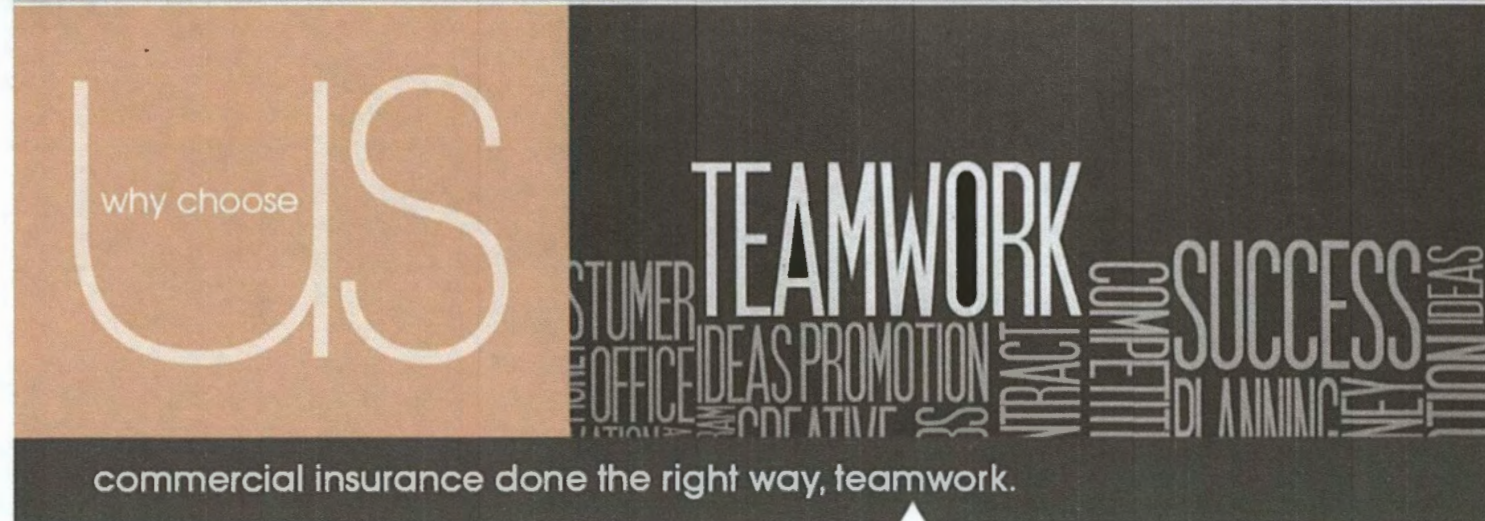
Acadia Insurance Company	Berkley Life and Health Insurance Company	Midwest Employers Casualty Company
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Admiral Insurance Company	Berkley Regional Insurance Company	Preferred Employers Insurance Company
American Mining Insurance Company	Berkley Regional Specialty Insurance Company	Queen's Island Insurance Company, Ltd.
Berkley Argentina de Reaseguros S.A.	Carolina Casualty Insurance Company	Riverport Insurance Company
Berkley Assurance Company	Clermont Insurance Company	StarNet Insurance Company
Berkley Insurance Company	Continental Western Insurance Company	Syndicate 1967 at Lloyd's
Berkley International Aseguradora de Riesgos del Trabajo S.A.	Fireman's Insurance Company of Washington, D.C.	Tri-State Insurance Company of Minnesota
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Berkley International Seguros Colombia S.A.	Great Divide Insurance Company	Union Standard Lloyds
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Berkley International Seguros S.A. (Uruguay)		W. R. Berkley Insurance (Europe), Limited

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senior management

Keith Mitchell
President

Edmund P. Hemmerick, CPCU, AIAF, ACP
Senior Vice President Operations

Jeff Hockersmith, CPA
Senior Vice President, Treasurer & Chief Financial Officer

Cathleen Link, CPCU
Senior Vice President, Chief Underwriting Officer

Michael W. Smith
Senior Vice President Claims

Tom Cawley, FCAS
Vice President, Chief Actuary

Dave Hinton, CIC
Vice President Sales

Jacquelynne Hurst
Vice President Marketing

Gregory R. Perkins
Vice President Information Services

Leslie Horwitz, SPHR
Vice President Human Resources

Ty Simmons
Vice President General Counsel & Secretary

Eugene Phillips, CIC, CSP, ARM
Regional Vice President

Niclas Radberg, CPCU, CIC
Regional Vice President

Ronald Roman, CPCU
Regional Vice President

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Jeff Hockersmith


Senior Vice President, CFO and Treasurer at Union Standard Insurance Group (a W. R. Berkley Company)


Union Standard Insurance Group (a W. R. Berkley Company) • University of Kansas

Dallas/Fort Worth Area • 404


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Experience

 **Senior Vice President, CFO and Treasurer**
Union Standard Insurance Group (a W. R. Berkley Company)
Mar 2013 – Present • 4 yrs 3 mos
Irving, Texas


 **Vice President, CFO and COO and Vice President, Controller**
QBE Americas, Inc.
Mar 2011 – Feb 2013 • 2 yrs
Plano, Texas and Irving, Texas
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Cathy Link


SVP and Chief Underwriting Officer at Union Standard Insurance Group (a W. R. Berkley Company)


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

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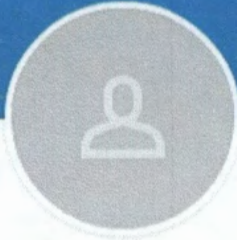
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Michael Smith
Claims - VP at Union Standard Insurance Co.
Union Standard Insurance Co.
Dallas/Fort Worth Area • 6 

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Union Standard Insurance Co.

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Dave Hinton
Vice President of Sales
Union Standard Insurance Group (a W. R. Berkley Company)
Irving, Texas • 500+

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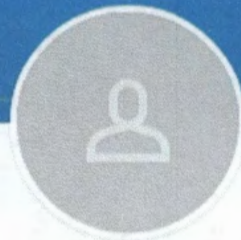


Vice President of Sales
Union Standard Insurance Group (a W. R. Berkley Company)

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Jacquelynn Hurst
V.P. Marketing Union Standard Insurance Group
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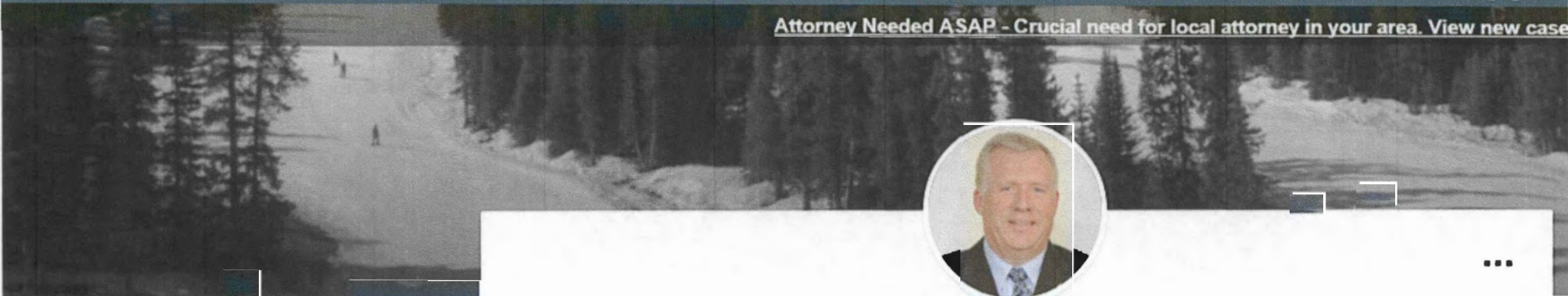
 **Vice President Marketing and Underwriting Services**
Union Standard Insurance Group
Jun 1998 - Present • 19 yrs

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Greg Perkins

VP Information Services - CIO at Union Standard Insurance Group
Union Standard Insurance Group • UTD
Dallas/Fort Worth Area • 293

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Experience

 **VP Information Services - CIO**
Union Standard Insurance Group
Aug 1981 - Present • 35 yrs 10 mos
Irving, TX



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Leslie Horwitz MBA,SPHR, SHRM-SCP, PMP

Vice President of Human Resources at Union Standard Insurance Group (a W. R. Berkley Company)

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Dallas/Fort Worth Area • 500+ 🌐

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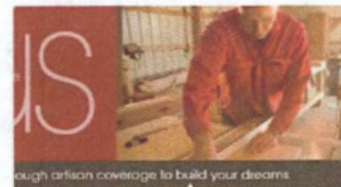
Vice President of Human Resources

Union Standard Insurance Group (a W. R. Berkley Company)

May 2015 – Present • 2 yrs 1 mo

Irving, Texas


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Ty Simmons
General Counsel

Union Standard Insurance Group (a W. R. Berkley Company) • Baylor University School of Law
Dallas/Fort Worth Area • 160

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Oversees corporate and regulatory compliance, insurance bad faith litigation, government relations and contract administration.

Experience

 **General Counsel**
Union Standard Insurance Group (a W. R. Berkley Company)
Feb 2009 – Present • 8 yrs 4 mos
Irving, Texas


Oversees corporate and regulatory compliance, insurance bad faith litigation, government relations and contract administration.

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Niclas Radberg
Branch Manager at Union Standard Insurance Group
Union Standard Insurance Group
Dallas/Fort Worth Area • 357

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Experience

 **Regional Vice President**
Union Standard Insurance Group
Jul 2011 - Present • 5 yrs 11 mos
Dallas/Fort Worth Area



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Dallas, TX 75320-0530

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For FED EX and other services requiring a physical address, please send the payments to:

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Direct Bill Payments
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For billing inquiries, or more information on any of our payment methods, please contact a billing representative at 800-955-0325 option 7, Monday - Friday between the hours of 8am - 5pm CST.

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